

EXHIBIT 311

Highly Confidential - Subject to Further Confidentiality Review

1 UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF OHIO
3 EASTERN DIVISION

4 IN RE: NATIONAL) MDL No. 2804
5 PRESCRIPTION OPIATE)
6 LITIGATION,) Case No.
7) 1:17-MD-2804
8)
9 THIS DOCUMENT RELATES TO) Hon. Dan A.
10 ALL CASES) Polster
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Wednesday, January 23, 2019

HIGHLY CONFIDENTIAL - SUBJECT TO FURTHER
CONFIDENTIALITY REVIEW

Videotaped Deposition of SUSANNE
HILAND, held at 4206 South J.B. Hunt Drive,
Rogers, Arkansas, commencing at 8:25 a.m., on
the above date, before Debra A. Dibble,
Certified Court Reporter, Registered
Diplomate Reporter, Certified Realtime
Captioner, Certified Realtime Reporter and
Notary Public.

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18 THE VIDEOGRAPHER:
19 Chris Ritona
 Golkow Litigation Services

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1 THE WITNESS: Yeah, I'm not
2 sure.

3 Q. (BY MR. INNES) This is
4 October 24th, 2017. Remind me when Walmart
5 decided to exit the distribution --
6 self-distribution of Schedule II narcotics.

7 MS. TABACCHI: Object to the
8 form. Lack of foundation.

9 THE WITNESS: I don't know when
10 the decision was made. We exited in
11 April 2018 for C-IIs.

12 Q. (BY MR. INNES) Okay. Was that
13 all C-IIs?

14 A. Yes.

15 Q. Okay. And this -- this email
16 from Darren, or Mr. Townzen, went to you,
17 Bryan -- is it Richard?

18 A. It is Richard.

19 Q. -- and Betsy Hall Collins?

20 A. Yes.

21 Q. And who is -- is Mr. Richard a
22 Walmart employee?

23 A. Yes.

24 Q. And what's his role?

25 A. He is senior director for